

REMARKS

The Examiner is thanked for the performance of a thorough search.

SPECIFICATION

In the specification, the title on page 1 has been amended to read as follows:

GENERATING A WEB PAGE BY REPLACING IDENTIFIERS IN A
PRECONSTRUCTED WEB PAGE

STATUS OF CLAIMS

Claims 1-24 have been cancelled.

Claims 25-49 have been added. No claims have been amended or withdrawn.

Claims 25-49 are currently pending in the application.

SUMMARY OF THE REJECTIONS

Claims 1-6, 8-22, and 24 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent Number 6,651,108 B2 issued to Popp et al. ("*Popp* ") in view of U.S. Patent Number 6,356,920 B1 issued to Vandersluis ("*Vandersluis* "). Claims 7 and 23 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Popp* in view of *Vandersluis* and in further view of U.S. Patent Number 5,860,073 issued to Ferrel et al. ("*Ferrel* "). The rejections are respectfully traversed.

RESPONSE TO REJECTIONS

A. CLAIM 25

(1) INTRODUCTION TO CLAIM 25

Claim 25 features:

"A method for generating web pages, comprising:
receiving a request for a requested web page;

in response to said request, retrieving a preconstructed web page that corresponds to said request for said requested web page, wherein:
said preconstructed web page was created prior to receiving said request,
said preconstructed web page is written in a tag-delimited page description language, and
said preconstructed web page includes an identifier that is located at a position between a pair of tags within said preconstructed web page;
in response to said request, **modifying said preconstructed web page to produce said requested web page** by causing a program to perform the steps of:
removing said identifier from said preconstructed web page, and
inserting replacement content at said position in said preconstructed web page;
providing said requested web page in response to said request.” (emphasis added).

Regarding the terminology of Claim 25, the terms “identifier,” “preconstructed web page,” “replacement content,” and “removing/inserting” are fully supported by the specification. No new matter is introduced. For example, a marker as described in the specification is an example of an “identifier” as used in Claim 25. As specific examples, the specification explains that “each marker indicates a relative position within the document for dynamic content insertion” (page 4, lines 23-25), and FIG. 3 along with the accompanying description on pages 11-12 of the application describe the exemplary markers “#HREF#,” “#SYMBOL#,” and “#COMPANY#.” In other words, a marker identifies, or serves as an “identifier” for, the position where the content is to be inserted.

As another example, a template as described in the specification is an example of a “preconstructed web page” as used in Claim 25. As a specific example, the specification explains that “each HTTP template is a modified Web page initially written as an interpretable script in a tag-delimited page description language, such as HTML or XML,” and FIG. 3 illustrates HTTP template 35. The fact that the templates are “preconstructed” is depicted in FIG. 8 in which block 101 illustrates retrieving a template for the requested web page from template repository 32 (page 15, lines 15-20).

As yet another example, dynamic content as described in the specification is an example of “replacement content” as used in Claim 25. As a specific example, the specification explains that the “controller program directs the engine to substitute markers within the template with dynamic content,” (page 5, lines 6-7), and in FIG. 10, block 155 illustrates replacing the marker with the value in the display region. In other words, the markers are replaced with content, or “replacement content,” as directed by the controller program.

As yet another example, substituting a marker with dynamic content as described in the specification is an example of “removing” the identifier and “inserting” replacement content as used in Claim 25. As a specific example, the specification explains that “each marker is substituted with dynamic content” and that “the dynamic content is inserted into the display region for the substituted marker,” Thus, the identifier is removed and the replacement content is inserted at the position indicated by the identifier.

Claim 25 features a **“preconstructed web page [that] includes an identifier that is located at a position between a pair of tags within said preconstructed web page” and “modifying said preconstructed web page to produce said requested web page by...removing said identifier...and inserting replacement content at said position.”** For example, in the embodiment illustrated in FIG. 3, an HTT template 35 includes three identifiers, #HREF#, #SYMBOL#, and #COMPANY#, which indicate three positions within HTT template 35.

As described on page 12 of the application, controller script 31 directs HTT engine 22 to substitute “http://www.acme.com” for #HREF#. Likewise, two rows are to be included to table 40 of FIG. 4, each of which includes identifiers #SYMBOL# 43 and #COMPANY# 44. Controller script 31 directs HTT engine 22 to substitute “ACME” for #SYMBOL# and “ACME Corporation” for #COMPANY# in the first row of the table and to substitute “ORCL” for #SYMBOL# and “Oracle Corporation” for #COMPANY# in the second row of the table.

Note that Claim 25 features “an identifier that is located at a position between a pair of tags within said preconstructed web page,” which distinguishes the identifier from the tags used in tag-delimited page description language of the preconstructed web page (e.g., HTML tags or XML tags). Also, in the approach of Claim 25, a program removes the identifier and

inserts replacement content at the position indicated by the identifier, such as by substituting "ACME" for "#SYMBOL#" as described above.

(2) *DISCUSSION OF POPP*

In contrast, *Popp* discloses an approach for generating object-oriented world wide web pages in which HTML elements are mapped to objects in an object-oriented environment. (Title, Abstract.) Specifically, *Popp* discloses defining classes of objects for each HTML element and the HTML document/page, and based on the one-to-one mapping between each HTML element and the object classes, the HTML documents can be manipulated programmatically through methods that are included in each object class. (Abstract.)

For example, in Table One of *Popp*, an HTML template is provided that includes a number of HTML elements, such as HTML, BODY, Paragraph (P), Ordered List (OL), and List Item (LI). (Col. 7, lines 51-53.) For each of the HTML elements, *Popp* defines a class, with the object class defining instance variables to store information associated with each HTML element (e.g., attributes or properties), and methods are defined to manipulate the HTML elements in order to render an HTML document based on the HTML elements of Table One. (Col. 7, lines 53-58.) FIG. 2 of *Popp* illustrates application 214 that includes objects 216 that correspond to the HTML elements of a WWW page, and the WWW page is rendered by application 214 sending a message to each object of objects 216 to render their corresponding HTML elements. (Col. 7, line 59 to Col. 8, line 2.)

(3) *THE OFFICE ACTION'S CITATIONS FROM POPP*

The Office Action states that *Popp* discloses "including one or more markers which each indicate a relative location within the Web page for dynamic content insertion (Col. 2 lines 35-38)." (Note that as discussed above, the markers described in the specification of the current application and referred to in the original claims, which are cancelled herein, are examples of the identifiers of the current set of newly added claims.) However, the portion of *Popp* cited merely describes HTML tags, which are also referred to as markers in the description of *Popp*. For example, *Popp* states:

Each HTML element is delimited by the pair of characters '<' and '>' [and] [t]he name of the HTML element is contained within the delimiting characters. The combination of the name and delimiting characters is referred to as a marker, or tag. Each element is identified by its marker. In most cases, each element has a start and ending marker. The ending marker is identified by the inclusion of another character '/' that follows the '<' character. (Col. 2, lines 55-62.)

This portion of Popp clearly and unambiguously equates the word "marker" as used in Popp with an HTML "tag." Similarly, *Popp* describes the use of declaration files with group extensions, explaining that a "NSWTAG marker is used to identify the bounds of the group," noting that the "NSWTAG extension is identified by the <NSWTAG> and </NSWTAG> delimiters." (Col. 11, lines 27-35.) Thus, the NSWTAG marker is also a type of tag or delimiter.

In contrast, Claim 25 features **"an identifier that is located at a position between a pair of tags within said preconstructed web page,"** and thus the identifier featured in Claim 25 is not a tag or delimiter that defines the bounds of an HTML element. Rather, the identifier is located at a position within a preconstructed web page, and the identifier is located between a pair of tags. Therefore, the "identifier" of Claim 25, for which the markers described in the present application are examples, is fundamentally different than the "markers" as used in *Popp* because *Popp's* markers are actually HTML tag/delimiters that define the bounds of an HTML element.

The failure of the Office Action's analogy of *Popp's* "markers" to the identifiers of the claims of the present application (or the markers of the specification of the present application) becomes even more readily apparent when considering that Claim 25 features removing the identifier and inserting replacement content at the position indicated by the identifier. If the Office Action's analogy were correct, then *Popp* would have to disclose that the tags/delimiters of the HTML elements are removed and content inserted at the positions indicated by the tags/delimiters, which clearly is not the case. There is nothing in *Popp* that discloses replacing HTML tags/delimiters. Rather, the markers in *Popp* are merely HTML tags/delimiters that define the bounds of various HTML elements, and thus *Popp* fails to disclose anything related to **"modifying said preconstructed web page to produce said requested web page by...removing said identifier...and inserting replacement content at said position."**

While *Popp* discloses “markers,” these are merely HTML tags or delimiters that define the bounds of HTML elements and do not relate to the use of an identifier in a preconstructed web page that is located at a position that is used to locate where replacement content is to be inserted in place of the identifier, as featured in Claim 25. As a result, *Popp* does not disclose, teach, suggest, or in any way render obvious a **“preconstructed web page [that] includes an identifier that is located at a position between a pair of tags within said preconstructed web page”** and **“modifying said preconstructed web page to produce said requested web page by...removing said identifier...and inserting replacement content at said position,”** as featured in Claim 25.

(4) *CONCLUSION OF DISCUSSION OF CLAIM 25 AND POPP*

Because *Popp* fails to disclose, teach, suggest, or in any way render obvious a **“preconstructed web page [that] includes an identifier that is located at a position between a pair of tags within said preconstructed web page”** and **“modifying said preconstructed web page to produce said requested web page by...removing said identifier...and inserting replacement content at said position,”** the Applicant respectfully submits that, for at least the reasons stated above, Claim 25 is allowable over the art of record and is in condition for allowance.

B. CLAIMS 37 AND 49

Claims 37 and 49 contain features that are identical to or at least similar to those described above with respect to Claim 25. In particular, both Claims 25 and 37 feature a **“preconstructed web page [that] includes an identifier that is located at a position between a pair of tags within said preconstructed web page”** and **“modifying said preconstructed web page to produce said requested web page by...removing said identifier...and inserting replacement content at said position.”** Similar to Claim 25, Claim 49 features **“a preconstructed web page”** that **“includes an identifier that is located at a position between a pair of tags within said preconstructed web page”** and **“a second program that...modifies said preconstructed web page to produce said requested web page by causing said first program to remove said identifier from said preconstructed web page and insert replacement content at**

said position in said preconstructed web page..." Therefore, based on at least the reasons stated above with respect to Claim 25, the Applicant respectfully submits that Claims 37 and 49 are allowable over the art of record and are in condition for allowance.

C. CLAIMS 26-36 AND 38-48

Claims 26-36 and 38-48 are dependent upon Claims 25 and 37, respectively, and thus include each and every feature of the corresponding independent claims. Each of Claims 26-36 and 38-48 is therefore allowable for the reasons given above for the Claims 25 and 37. In addition, each of Claims 26-36 and 38-48 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time. Therefore, it is respectfully submitted that Claims 26-36 and 38-48 are allowable for the reasons given above with respect to Claims 25 and 37.

CONCLUSION

The Applicant believes that all issues raised in the Office Action have been addressed and that allowance of the pending claims is appropriate. After entry of the amendments, further examination on the merits is respectfully requested.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Hon. Commissioner for Patents, Mail Stop AMENDMENT, P.O. Box 1450, Alexandria, VA 22313-1450.

on 5/24/04

by [Handwritten Signature]